

Ward Penberthy

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To: masantoro@mmm.com
cc: (bcc: Mary Dominiak/DC/USEPA/US)
Subject: Follow-up Questions Regarding 3M LOI Commitments

In the March 13, 2003 3M Letter of Intent there are commitments to environmental monitoring. We would like to understand precisely what work is being undertaken and would appreciate some clarification about these LOI items. After we understand the specifics of the LOI commitments, we will be in a better position to identify testing issues that are adequately dealt with in the LOIs vs. items that may need to be addressed in the ECA discussions commencing on June 6.

To that end, could you please provide a detailed description of the environmental monitoring studies that are described in the LOI? In addition, EPA requests clarification on the following specific items:

page 7 item 3

Monitoring of groundwater, surface water and other environmental media

- How many samples will be analyzed from each location?
- What is the sampling strategy?
- What test method (standard) will be used to analyze the samples (e.g., ASTM, EPA, OECD, other specify)?
- Has the test method ever been validated?
- What is the accuracy and precision of the test method?
- Will PFOA precursors and/or other chemicals be analyzed for in addition to APFO/PFOA? If so, which ones?
- What is the timing of this work?
- Do you have a consolidated written description of the procedures that will be followed with this testing? If so please provide a copy. If these procedures have already been identified in a submission to the Agency (ie. to AR226 or 8(e)), please identify the submission.

We would appreciate a response by May 5, 2003. Please call me at 202 564 -8171 if you have any questions or need to discuss further. Thanks for your continued help on these matters.